



478 Pennsylvania Ave. Suite 203  
Glen Ellyn, IL 60137

August 18, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: Ex Parte Notification, GN Docket 17-258 (Promoting Investment in the 3550-3700 MHz Band)**

Dear Ms. Dortch:

KWISP recommends 4 criteria for any changes to license areas in the CBRS band:

- 1) Spectrum should benefit all Americans, urban and rural.
- 2) All service providers should be able to follow the same rules.
- 3) Implementation should be technically feasible.
- 4) The system should not be prohibitively complex.

The original 2015 rules did a good job satisfying #1 and #2, but some commenters have suggested changes are needed to satisfy #3 and #4. Surely this can be accomplished without “throwing the baby out with the bathwater”.

Census tracts have many desirable characteristics. They are designed to uniformly have around 4,000 population, tend to follow natural and local government boundaries, exist on a national level, and were established by the US Census Bureau on a non partisan basis. The FCC already uses census tracts for broadband subscription reporting on Form 477.

The main objection seems to be that urban census tracts can be tiny, especially in large cities.

We suggest that FCC staff be tasked with identifying census tracts smaller than some minimum size, and aggregating contiguous tracts to form manageable bidding/licensing units. (Minimum size to be something like 50 square miles, not whole counties or PEAs.)

Only contiguous whole tracts should be combined. Tracts that already meet the minimum spatial size, and isolated small tracts in rural towns, should be left alone.

Regards,

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